

25 June 2020

Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124.

Dear Sir/Madam

**SUBMISSION TO PROPOSED “SYDNEY METRO WEST” STATE SIGNIFICANT INFRASTRUCTURE PROJECT,
APPLICATION REFERENCE SSI-10038**

We refer to the above State Significant Infrastructure (SSI) Application (Reference No. SSI-10038) that seeks Concept and Stage 1 approval for “*construction and operation of a metro rail line, around 24 kilometres in length, between Westmead and the Sydney CBD*” including new metro stations at Westmead, Parramatta, Sydney Olympic Park, North Strathfield, Burwood North, Five Dock, The Bays and the Sydney CBD. Milestone (AUST) Pty Limited (Milestone) acts for Mr Mathew Massasso, one of the members of the Five Dock Chamber of Commerce. Milestone has visited Five Dock Local Centre and the surrounding area, reviewed the documentation submitted by the proponent that has been made available on the Department of Planning, Industry and Environment (DPIE) Major Projects website including:

- Westmead to The Bays and Sydney CBD Environmental Impact Statement (EIS) Summary.
- The main EIS document including the following chapters:
 - Chapter 5 - Stakeholder and community engagement.
 - Chapter 6 - Concept description.
 - Chapter 7 - Placemaking.
 - Chapter 10 - Transport and traffic - Stage 1.
 - Chapter 11 - Noise and vibration - Stage 1.
 - Chapter 16 - Business impacts - Stage 1.
 - Chapter 23 - Air quality - Stage 1.
 - Tech Paper 1 - Transport and traffic.
 - Tech Paper 2 - Noise and vibration (Part 1).
 - Tech Paper 2 - Noise and vibration (Part 2).
 - Tech Paper 6 - Social impact assessment.

In addition, Milestone has reviewed the NSW Customer Service Commissioner’s report titled “Impacts of new government infrastructure on small business” dated February 2019.

1. Background and Description of Proposal

1.1 The proposed project is described in the proponent’s EIS as follows (where relevant to this submission):

- “*Sydney Metro West (the Concept) involves the construction and operation of about 24 kilometres of underground metro rail between Westmead and the Sydney CBD.*”
- *New metro stations at Westmead, Parramatta, Sydney Olympic Park, North Strathfield, Burwood North, Five Dock, The Bays and Sydney CBD.*
- *A turn-up-and-go metro service operating early morning to late at night, between Westmead and the Sydney CBD.*
- *Pedestrian links and connections to other modes of transport (such as the existing suburban rail network and other parts of the metro network) and surrounding land uses.*
- *Services within each of the metro stations, including mechanical and fresh air ventilation equipment and electrical power substations to supply power for operation.*

- Alterations to pedestrian and traffic arrangements, cycling and public transport (e.g. bus) infrastructure around the metro stations.
- Subdivision of station sites to support integrated station and precinct development and ancillary facilities.
- Ancillary facilities to support construction.”

1.2 **Figure 1** shows the layout of the proposed Five Dock constructions sites.



Figure 1: Construction Site Map

Source: Westmead to The Bays and Sydney CBD Environmental Impact Statement Summary

1.3 The Five Dock Chamber of Commerce Chamber currently has 40 members. The key role of the Chamber is to support and promote businesses in the Five Dock area. The Chamber works closely with Council in creating a friendly and clean environment for community and assists members in developing their skills to further improve their business.

1.4 The Chamber is a key stakeholder and over the past five years has worked with Council in the coordination of an Urban Design Study for Five Dock to improve the streetscape and amend building floor space controls. Over the past 21 years the Chamber has also been closely involved with Council in promoting the annual event “Ferragosto” which attracts over 100,000 people each year.

2. Grounds for Objection

Car Parking, Traffic and Transport Impacts

2.1 The construction phase of the project will temporarily remove a minimum of 34 on-street car parking spaces as follows:

- 12 on-street car parking spaces along the western side of Great North Road to the North of Fred Kelly Place, adjacent to the Five Dock Station west construction site. Further off-street parking spaces provided to customers of 165-167 Great North Road and private parking for 169 Great North Road is also proposed to be removed due to demolition of these buildings.
- 12 off street restricted parking spaces from Second Avenue.

- Up to 10 on-street parking spaces will be removed to accommodate construction vehicle movements near the site along Waterview Street (unrestricted parking) and Second Avenue (time-restricted parking), respectively, to accommodate construction vehicle movements.

2.2 At 75.7% Five Dock Local Centre has the highest proportion of private motor vehicle (cars) usage after Silverwater and Clyde. Given the significant reliance on travel by cars, it is imperative that details of mitigation measures is provided by the proponent regarding provision of car parking provided elsewhere within Five Dock Local Centre to compensate for the proposed removal of public car parking (minimum of 34 car parking spaces).

2.3 Any reduction number of car parking spaces will detrimentally impact the business surrounding the proposed construction of Five Dock Station. Workers at the construction site will also be parking their vehicles within the vicinity of the proposed construction of Five Dock Station. Further clarification is required to mitigate the impacts of the reduction of parking spaces and compounding impact of worker vehicle parking during the construction of the proposal is required.

2.4 The EIS states the following:

“A loading zone is located on the northern side of Henry Street near Great North Road and a mail zone is on the northern side of Garfield Street near Great North Road. There are no kiss and ride zones on roads immediately surrounding the construction site.”

Further clarification is required from the proponent in regards to the loss of any existing loading zones and mail zones relevant to the project as the removal and or relocation of these types of facilities will have a significant impact on the local businesses reliant on these services. In addition, any relocation of bus stops and taxi parking is required to be addressed. In the event bus stops and associated public transport facilities are to be removed or relocated, the location of the new bus stop is to be provided for review and comment by the public.

2.5 The proposal will generate an increased number of trucks travelling through Great North Road during the proposed demolition, excavation and construction of the Five Dock stations. **Figure 2** outlines the daily total number of truck movements.

Phase	Total movements per day		
	Light vehicles	Heavy vehicles	Total
Phase 1 – Demolition and site establishment			
Western construction site	32	136	168
Eastern construction site	32	136	168
Phase 2 – Piling and excavation (standard working hours)			
Western construction site	84	124	208
Eastern construction site	128	100	228
Phase 2 – Excavation (24 hours)			
Western construction site	108	230	338
Eastern construction site	164	192	356

Figure 2: Daily construction movements per day by phase
Source: Technical Paper 1

The report states the following:

“During the morning peak hour presented in this assessment (7 am to 8 am), it is anticipated that the western construction site would generate 14 light vehicle movements (14 light vehicles travelling to the western construction site) and eight heavy vehicle movements (four heavy vehicles travelling to and from the western construction site), and the eastern construction site would generate 18 light vehicle movements (18 light vehicles travelling to the eastern construction site) and eight heavy vehicle movements (four heavy vehicles travelling to and from the eastern construction site).

During the evening peak hour presented in this assessment (5 pm to 6 pm), it is anticipated that the western construction site would generate 12 light vehicle movements (12 light vehicles travelling from the western

construction site) and eight heavy vehicle movements (four heavy vehicles travelling to and from the western construction site), and the eastern construction site would generate 12 light vehicle movements (12 light vehicles travelling from the eastern construction site) and eight heavy vehicle movements (four heavy vehicles travelling to and from the eastern construction site)."

Construction vehicles will be utilising Great North Road as the principle access route for the western and eastern construction site. Construction of the two Five Dock sites will be 24 hours a day and it is noted that trucks will be travelling outside of the hours mentioned within the technical paper (up to 10 heavy vehicle movements per hour during the overnight time period).

2.6 Any greater number of trucks travelling along Great North Road beyond the details provided above will result in reduction of pedestrian safety, cause potential pedestrian-vehicle conflict, reduce amenity of the Five Dock Local Centre and contribute to flow-on economic and amenity impacts related to loss of trade, decreasing the attractiveness of the Local Centre as a place to visit and conduct business and result in traffic congestion.

2.7 The potential significant traffic impacts of the project are noted in Chapter 10 of the EIS, which states:

"Sydney Metro is continuing to investigate construction site access arrangement to reduce potential impacts and minimise conflicts with heavy vehicle movements. This includes the potential conversion of Waterview Street (north of the car park) to one-way northbound circulation."

Details of the construction site access arrangements must be provided as soon as practicable for public exhibition and comment. Any changes to the movement of traffic along any roads within Five Dock must also be provided prior to the determination of the SSI Application.

2.8 Further clarification is therefore required from the proponent to:

- Calculate the rate at which trucks will be travelling on Great North Road outside of peak times.
- Specify the provisions for new and additional directional and information signage and footpaths may be required to redirect pedestrian traffic safely along Great North Road.
- Provide details of any temporary or relocated pedestrian crossings and temporary pedestrian access routes.
- Outline the location of lighting, ramps and other overlays that will be required for the duration of the project.

Economic Impacts

2.9 No economic impact statement has been submitted with the SSI Application. An in depth assessment into the economic impacts is requested to be prepared prior to determination of the SSI Application to enable a full and proper assessment of the full range of economic impacts on the Five Dock Local Centre. The proposed demolition, excavation and construction of the Five Dock station will occur over a two year time period and will have significant detrimental impacts on existing businesses currently located in Five Dock Local Centre.

2.10 The EIS notes the following:

"Potential temporary indirect business impacts could include temporary constraints or restrictions on servicing and delivery/access, amenity issues such as increased traffic congestion, noise, vibration and dust, changes to customer access and parking."

Except where required for subsequent construction activities associated with future stages of the Concept, temporary use areas for construction purposes would be stabilised and appropriately rehabilitated as soon as feasible and reasonable following completion of construction. This would be carried out in consultation with the relevant landowner."

2.11 Given the potentially significant impacts that will be experienced by business owners within Five Dock Local Centre for approximately two years for the construction of the Five Dock Metro Station, it is unacceptable that the timeframes for rehabilitation following the completion of construction are not specification. We request specific target timeframes are provided as part of this SSI Application to provide assurances to all local businesses within Five Dock Local Centre of the end of works associated with the Sydney Metro station.

Pedestrian Impacts

- 2.12 Great North Road is a key pedestrian access route for Five Dock and includes a number of pedestrian crossings at the following locations:
- Great North Road/Ramsay Road/First Avenue intersection (signalised crossing).
 - Great North Road/Garfield Street intersection (signalised crossing).
 - Great North Road/Lyons Road intersection (signalised crossing).
 - Great North Road/Queens Road/Fairlight Street intersection (signalised crossing).
 - Great North Road at Fred Kelly Plaza (signalised crossing).
 - A raised zebra crossing across Great North Road near Henry Street. (non-signalised crossing).
- 2.13 Further clarification is required from the proponent for provisions to redirect pedestrians flows, provision of any new pedestrian crossings and any proposed relocation of existing pedestrian crossings. It is important that pedestrian flows are not impacted, and that the amenity is maintained to allow pedestrians to access business along Great North Road with ease. Increase signage and lighting is required to maintain pedestrian safety.
- 2.14 It is noted that there a substantial component of customers within Five Dock Local Centres are elderly and will be particularly susceptible to major changes in the pedestrian movement conditions, the loss of on-street car parking close to existing retail and business services and increases in heavy vehicle traffic along Great North Road and surrounding streets. Any discouragement of the elderly to visit Five Dock Local Centre could in turn greatly impact on the economic viability of the centre.

Noise and Vibration Impacts

- 2.15 The EIS has predicted potentially significant noise and vibration impacts on properties adjacent to the construction sites within Five Dock. We request that dilapidation reports are prepared for each property along Great North Road to record the current physical and structural condition of all relevant buildings and to assess any vibration impacts resulting from the project.
- 2.16 Prior to the commencement of any works, information is to be provided to all land owners within Five Dock Local Centre regarding:
- The type of works and like vibration impacts that will occur (in “plain-English”).
 - Measures to reduce the impacts of the demolition, excavation and construction works at the Five Dock Station sites.
 - 24 hour phone contact details for relevant construction manager to report impacts experienced during demolition, excavation and construction.

Other Matters

Consultation with Elderly and At-Risk Community during COVID-19

- 2.17 We seek assurances that community consultation is extended and a face-to-face approach is adopted to provide opportunities for consultation is provided to elderly. It is noted that due to the COVID-19 pandemic other measures should be taken to extend the consultation time period and to reach the elderly community within the surrounding Five Dock area.

We refer to the NSW Customer Service Commissioner’s report titled “Impacts of new government infrastructure on small business” dated February 2019. We recommend that all recommendations within the report including the “Easy Access” principle is adopted to involve small businesses in the consultation process for the entirety of the project.

Integrated stations and precinct developments

- 2.18 The EIS and supporting documentation notes the following:

"An integrated station and precinct development is made up of the metro station and building(s) above and/or around the station that could deliver a range of uses like community facilities, new homes and green space, shops, restaurants and commercial office spaces."

- 2.19 Whilst it is acknowledged any future development proposed over the Five Dock Metro Station will be subject of a separate application process, it is necessary for the SSI Application to acknowledge impacts on Five Dock Local Centre will continue beyond the approximate two year construction period for the project. We request the SSI Application provides a clear analysis of the cumulative impacts of any future integrated station and precinct development on the basis such future development is being facilitated by the proposed Five Dock Metro Station project.

Amenity Impacts

- 2.20 The demolition, excavation and construction of the Five Dock station will consist of the following landscape and visual changes.

"The key activities and components that would be seen at the Five Dock Station western construction site include:

- *Demolition of commercial buildings, structures and a car park*
- *Removal of about 15 trees and all other vegetation within the site including several small trees facing East Street and seven trees within 23 and 25 Waterview Street*
- *Possible trimming of some trees which overhang the site*
- *Car parking, laydown area and a water treatment plant*
- *A metal clad acoustic shed (about 15 metres in height) (or other acoustic measures)*
- *Station shaft excavation works and support*
- *Station cavern excavation and temporary storage*
- *Hoarding surrounding the construction site, about three metres in height.*

The key activities and components that would be seen at the Five Dock Station eastern construction site include:

- *Demolition of residential buildings and a car park*
- *Removal of about seven trees within the site and the trimming of some trees overhanging the site*
- *Office and staff amenities double stacked along Waterview Street*
- *Water treatment plant along Waterview Street, a workshop and dangerous good storage*
- *A metal clad acoustic shed (about 15 metres in height) (or other acoustic measures)*
- *Station shaft excavation works and support*
- *Station cavern excavation and temporary storage*
- *Adjustments to parking, public transport and pedestrian access*
- *Hoarding surrounding the construction site, about three metres in height."*

- 2.21 Due to the significantly reduced landscape and visual amenity of the Five Dock Local Centre for two years, we recommend temporary "pop-up" and "parklet" public domain activation areas are to be implemented and provided by the proponent to provide some improvement to the amenity of Five Dock Local (refer to **Figures 2 and 3** for examples).

- 2.22 Opportunities to provide temporary art displays and other similar activations during the construction period should also be implemented to sustain public interest and visitation to Five Dock Local Centre. The flow-on benefit of temporary park/pop-up activations and artistic displays will be the support for ongoing economic activity linked to ongoing provision of retail, health and business services within Five Dock Local Centre.



Figure 2: Example of pop-up park/parklet that could be implemented in Five Dock Local Centre



Figure 3: Example of pop-up park/parklet that could be implemented in Five Dock Local Centre

Future New Laneways for Five Dock Local Centre

- 2.23 The Canada Bay Development Control Plan (DCP) identifies a series of vehicle and pedestrian lanes that are located within the Five Dock Town Centre. The DCP does not nominate any timeframe when the lanes are proposed to be completed. Milestone has also previously enquired with Council Planning Officers and no timeframe has been provided by Council Officers in regards to when the laneways will be delivered.
- 2.24 The provision of the majority of new laneways is reliant on landowners releasing their land to Council to develop into vehicle and pedestrian lanes, typically this is initiated when a landowner lodges a Development Application with Council for the redevelopment of their property. Without any overarching public policy or binding commitment issued by Council, there is no certainty therefore that the lanes will be completed.
- 2.25 The proposed Sydney Metro project is a significant project for the Five Dock Local Centre in terms of site area, implications in vehicle generation and pedestrian movement and on the grounds the size and scale of the Sydney Metro development was never contemplated when the DCP was prepared.
- 2.26 The new lanes noted in the DCP are therefore not relevant and should be reviewed in light of the Sydney Metro development. On this basis we request the SSD Application clearly states the intention of Sydney Metro in regard to whether the lanes will be delivered as part of the project.

3. Recommendations and Request for Additional Information to Address Significant Impacts

- 3.1 As outlined in this submission, the proposed development of the new Metro West Five Dock Station will have significant and far reaching impacts upon the entirety of the Five Dock Local Centre, including most significantly impacts on small businesses during the demolition, excavation and construction phases of the project.
- 3.2 There is a need for Sydney Metro to implement a range of measures during the demolition, excavation and construction phases to minimise impacts on Five Dock Local Centre. Additional information and clarification is also requested to be provided to DPIE during the assessment of the SSI Application to ensure appropriate mitigation measures, and amendments to the proposal, are incorporated into the design of the project and exhibited to the public for further review and comment prior to any SSI Application determination being issued.
- 3.3 Table 1 provides a summary of the impacts raised in this submission and provides our requested response from the proponent to be submitted as additional information for assessment by DPIE during the SSI Application assessment process.

Table 1: Summary of Key Impacts and Request for Additional Information

Issue/Impact	Requested Response from Proponent to Address Impact
1. Loss of on-street car parking spaces during construction phase	<ul style="list-style-type: none"> • Relocation of the minimum 34 car parking spaces elsewhere within Five Dock Local Centre during construction phase. • Details regarding specific duration and timing for car parking to be removed from the site and reinstatement. • Confirmation of reinstatement of all car parking removed from Five Dock Local Centre. • Detail regarding relocated bus stops and on-street loading zones and details regarding pedestrian access to any relocated bus stops/loading zones. Any resultant car parking loss to be also addressed.
2. Pedestrian safety and access during construction	<p>Concept plans showing:</p> <ul style="list-style-type: none"> • Location of proposed pedestrian routes. • Details of indicative temporary pedestrian routes. • Analysis of safe and accessible pedestrian routes and crossings with particular focus on suitability for disabled and elderly residents
3. Economic impacts on trading of businesses	<p>Additional details including:</p> <ul style="list-style-type: none"> • Detailed economic impact assessment. • In-depth consultation with all business owners within Five Dock Local Centre. • Framework of commitments and strategy to be implemented by Sydney Metro. • Name and contact details of relevant persons to be the liaison for businesses impacted during the project. • Details of measures and financial investment to be made available to all impacted businesses during and post-construction phases.
4. Dust emissions	<ul style="list-style-type: none"> • Draft dust mitigation measures to be implemented. • Inclusion of cleaning of dust from all affected properties including regularly cleaning and budget/costs apportioned for such cleaning. • Details of equipment used for cleaning dust. • Commitments on frequency of cleaning of dust.
5. Placemaking Strategy	<ul style="list-style-type: none"> • Noting placemaking strategy will be a future application process, the following key issues require attention: • Walking and cycling connections to be integrated with new metro stations. • Appraisal of all on-street car parking to be undertaken with no loss of existing car parking in Five Dock Local Centre. • Improved pedestrian connections to be delivered to facilitate movement within Five Dock Local Centre.
6. Noise and vibration	<ul style="list-style-type: none"> • Details of indicative respite periods are to be provided and incorporated into the construction methodology. Including respite periods will impact timeframes for demolition, excavation and construction works and may result in the overall two year timeframe for the Five Dock Metro Station to be extended. • A Construction Noise and Vibration Management Plan (CNVMP) is to be provided prior to determination of the SSI Application to address these matters. • Dilapidation reports are prepared for each property along Great North Road to record the current physical and structural condition of all relevant buildings and to assess any vibration impacts resulting from the project.
7. Acknowledgement of further additional impacts	<ul style="list-style-type: none"> • The documentation submitted with the SSI Application must acknowledge the further, potentially significant adverse impacts resulting from the construction of any “over station development” or “Integrated station and precinct development”. Economic and amenity impacts may continue for several years following the completion of the Metro Station works on this basis.

4. Conclusion

4.1 The Five Dock Chamber of Commerce supports the NSW Government’s intention to deliver an integrated transport system for Sydney. However, as noted in this submission, the Sydney Metro West

project will have potential significant adverse amenity, economic and social impacts on the Five Dock Local Centre.

- 4.2 Additional information and clarification is requested from the proponent to address the significant impacts of the project. This additional information is requested to be submitted and publically exhibited for review and comment before any determination of the application is made.

If you require any clarification of this matter, please contact the undersigned.

Yours sincerely

Milestone (AUST) Pty Limited

A handwritten signature in black ink, appearing to read 'P. Lebon', written in a cursive style.

Patrick Lebon

Director